

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

WILSON OCHAR

**PLAINTIFF**

vs.

LENTEGRITY AND  
MERLEX AUTO GROUP

**DEFENDANTS**

**Case No. 1:24-cv-00926 (CMH/WBP)**

**MERLEX AUTO GROUP'S MOTION TO DISMISS OR IN  
THE ALTERNATIVE, TO COMPEL ARBITRATION**

Defendant Setayesh, Inc., t/a Merlex Auto Group<sup>1</sup> (“Merlex”) moves this Court, under Fed. Rules Civ. P. 12(b)(1), (6) and the Federal Arbitration Act, 9 U.S.C. §§ 1-15, for an order dismissing the complaint, or, in the alternative, compelling arbitration and staying these proceedings. As explained more fully in the defendant’s supporting memorandum of law, which is incorporated here, all of the claims in the complaint are arbitrable under an agreement the plaintiff signed.

**WHEREFORE**, the defendant respectfully requests that the Court grant this motion and dismiss the complaint, that the Court award the defendant its costs of these proceedings, and that the defendant be granted such other and further relief as the Court deems just.

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<sup>1</sup> The Correct legal name for the entity in Setayesh, Inc., t/a Merlex Auto Group

**NOTICE TO PRO SE PLAINTIFF WILSON OCHAR:**

**(1) You are entitled to file a response opposing this motion and that any such response must be filed within twenty-one (21) days of the date on which this motion is filed; and,**

**(2) The Court could dismiss the action on the basis of the Defendant's papers if you do not file a response; and,**

**(3) You must identify all facts stated by the Defendant with which you disagree and must set forth your version of the facts by offering affidavits (written statements signed before a notary public and under oath) or by filing sworn statements (bearing a certificate that it is signed under penalty of perjury); and,**

**(4) You also entitled to file a legal brief in opposition to the one filed by the Defendant.**

Respectfully Submitted

**SETAYESH, INC t/a  
MERLEX AUTO GROUP  
BY COUNSEL**

/S/ David R. Mahdavi  
David R. Mahdavi  
Virginia State Bar Id. # 27417  
**MAHDAVI, BACON**  
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**Counsel for Defendant Setayesh, Inc.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was sent through the Court's ECF system and by email and first-class mail this 5<sup>th</sup> day of August 2024 to:

Wilson Ochar  
928 Manor Road  
Apartment 202  
Alexandria, VA 22305  
Wilson.ochar@gmail.com

**Plaintiff Pro Se**

And by First class mail to:

Lentegrity  
27472 Portola Pkwy #205-345  
Foothill Ranch California 92610

/S/ David R. Mahdavi  
David R. Mahdavi